



**Office of the New York State
Attorney General**

**Letitia James
Attorney General**

January 27, 2025

By ECF

The Honorable Kenneth Karas
United States District Judge
The Hon. Charles L. Brieant Jr.
Federal Building and Courthouse Southern District of New York
300 Quarropas Street White Plains, New York 10601

Re: Jaime v. NYS DOCCS et al.
SDNY White Plains, 24-cv-02758-KMK

Jaime v. Guzman et al.
SDNY White Plains 24-cv-03763-KMK

Luis Jaime v. Officer Reddish and E. Wilson C.O.,
SDNY White Plains 24-cv-03819-KMK

Dear Judge Karas:

In Jaime v. Guzman et al., 24-cv-03763-KMK, your Honor, by Order dated October 23, 2024, granted Plaintiff an extension of time to amend his complaint, until December 15, 2024. *See Dkt. 19, 24-cv-03763-KMK.* Further, in Jaime v. NYS DOCCS et al., 24-cv-02758-KMK, your Honor, by Order granted Plaintiff an extension until December 18, 2024, for Plaintiff's attorney to file a notice of appearance. *See Dkt. 27, 24-cv-02758-KMK.* By Order dated November 4, 2024, your Honor instructed that both Jaime v. NYS DOCCS et al., and Jaime v. Guzman et al., shall remain on the same schedule. *Dkt. 25, 24-cv-02758-KMK.* To date no notice of appearance or an amended complaint has been filed in either matter.

Additionally, Plaintiff Luis Jaime filed a third lawsuit captioned Luis Jaime v. Officer Reddish and E. Wilson C.O., 24-cv-03819-KMK. *See Dkt. 1, 24-cv-03819-KMK.* This lawsuit also arises out of the same allegations from the prior two cases, as he alleges that the Defendants in Luis Jaime v. Officer Reddish et al., retaliated against him because he claimed that a Sergeant and his Officers assaulted him during an outside hospital trip, which is the basis of his complaint in Jaime v. NYS DOCCS et al., 24-cv-02758-KMK. *See Dkt. 1, Compl. p. 4, 24-cv-03819-KMK.* Further, the basis of the complaint in Jaime v. Guzman et al., 24-cv-03763-KMK, (*See Dkt. 1*), is that Defendants failed to properly treat and document the alleged injuries sustained in Jaime v. NYS DOCCS et al., because the Defendants wanted to cover up the alleged attack. As such, all three complaints revolve around the same underlying incidents.

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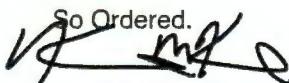
Plaintiff has been given multiple extensions, but to date he has neglected to take any action. For instance, in Jaime v. NYS DOCCS et al., 24-cv-02758-KMK, Plaintiff requested permission to amend the complaint on June 6, 2020, (*See Dkt. 13*), which was granted by your Honor's Order dated August 2, 2024. *See Dkt. 14*. To date, Plaintiff has not amended his complaint. Then Plaintiff was given an additional 30 days to have his attorney file a notice of appearance by your Honor's Order dated November 18, 2024. *See Dkt. 18*. To date, Plaintiff has not done that.

Moreover, in Jaime v. Guzman et al., 24-cv-03763-KMK, Plaintiff was ordered by your Honor on October 9, 2024, to respond to my October 31, 2024, letter advising that Plaintiff did not amend his complaint and instructed him to have his counsel file a notice of appearance if he had one. *See Dkt. 16*. To date Plaintiff did not have his attorney file a notice of appearance nor was an amended complaint filed. Rather, Plaintiff again requested an extension (*Dkt. 18*) and by your Honor's Order dated October 23, 2024, was given "one last deadline to file his amended complaint which is now due 12/15/2024." *Dkt. 19*. The Order further stated, "If plaintiff wishes to seek appointment of pro bono counsel, that motion is due 11/6/24. That deadline will not be moved." *Id.* To date, Plaintiff has done neither despite your Honor's Orders.

Given Plaintiff's noncompliance, I respectfully request that your Honor mark all three cases discussed in this letter where Luis Jaime is the Plaintiff as related. I then respectfully request leave on behalf of all Defendants I represent to answer or otherwise move with regard to the three complaints by no later than February 28, 2025, on all three dockets.

Thank you for your attention to these matters.

All requests are granted. For the reasons explained in this letter, the Court deems the three cases captioned in this letter to be related. Defendants are to answer or submit a pre-motion letter by 2/28/25. The Clerk is respectfully directed to mail this letter to Plaintiff.

So Ordered.

1/27/25

Sincerely,

/s/ Christopher J. Byrne
Christopher J. Byrne
Assistant Attorney General
28 Liberty Street
New York, NY, 10005
212-416-8687
Christopher.Byrne@ag.ny.gov

cc: Luis Jaime
DIN: 22B4805
Upstate Correctional Facility
309 Bare Hill Road
P.O. Box 2001, Malone, NY 12953